

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICANT(S): Matthias Breuer ATTORNEY DOCKET NO.: 30014200-1007
SERIAL NO. 09/921,224 GROUP ART UNIT: 2178
DATE FILED: August 1, 2001 EXAMINER: Kyle R. Stork
INVENTION: "METHODS AND SYSTEMS FOR INPUTTING DATA INTO SPREADSHEET DOCUMENTS"

ARGUMENTS ACCOMPANYING PRE-APPEAL BRIEF REQUEST FOR REVIEW

Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

S I R:

These Arguments accompany a Notice of Appeal and a Pre-Appeal Brief Request for Review, all of which are filed in response to the Final Office Action of April 20, 2006 and Advisory Action of July 14, 2006. Please reconsider the application in view of the arguments presented below.

ARGUMENTS

Claims 1-18 are pending in the application.

In the Final Office Action of April 20, 2006, the Examiner made the following disposition:

- A.) Rejected claims 1-6 and 8-16 under 35 U.S.C. §103(a) as being allegedly unpatentable over *Kanai* (U.S. Patent No. 5,339,410) ("Kanai") in view of *Bhansali, et al.* (U.S. Patent No. 6,006,239) ("Bhansali").
- B.) Rejected claims 7, 17, and 18 under 35 U.S.C. §103(a) as allegedly being unpatentable over *Sorge et al.* (U.S. Patent No. 6,691,281) ("Sorge") in view of *Zellweger et al.* (U.S. Patent No. 6,185,582) ("Zellweger") and further in view of *Bhansali, et al.*

In the Advisory Action of July 14, 2006, the Examiner maintained the rejections.

As discussed in more detail below, Applicants submit that the Examiner has made clear error in the rejection. Applicants respectfully request that the application be allowed on the existing claims.

A.) Claims 1-6 and 8-16 are not rendered obvious under 35 U.S.C. §103(a) based on *Kanai* (U.S. Patent No. 5,339,410) (“*Kanai*”) in view of *Bhansali, et al.* (U.S. Patent No. 6,006,239) (“*Bhansali*”):

Independent claims 1, 8, and 11 each claim subject matter relating to overriding without deleting the original content of a first cell with a first value and then recalculating the cells. Then, the original content of a second cell is overridden, without being deleted, with a second value and the cells are recalculated again. Then, the original content of the first cell is automatically restored, while the second value is maintained in the second cell.

The first cell keeps the original content of the first cell in the first cell while the original content of the first cell is overridden, and the second cell keeps the original content of the second cell in the second cell while the original content of the second cell is overridden. Thus, the original content of the first cell is automatically restored independently of restoring the original content of the second cell, and after multiple recalculations.

Applicants respectfully submit that the Examiner has made clear error by rejecting Applicants’ claimed invention based on *Kanai* in view of *Bhansali*. Specifically, *Kanai* in view of *Bhansali* clearly fails to disclose or suggest overriding without deleting an original content of a cell, and then automatically restoring the original content to the cell after multiple recalculations, and independently of restoring an overridden, original content to a second cell.

Kanai teaches a method of bidirectional recalculation of cells, which is recalculations can be performed in both directions. For example, the value in cell A may automatically change when a user inputs a new value into cell B, and the value in cell B may automatically change when a user inputs a new value into cell A. *See, e.g., Kanai* Figures 2 and 3.

Contrary to the Examiner’s argument, *Kanai* does not override, without deleting, the original content of a cell. As *Kanai* clearly describes with reference to the example in Figures 2 and 3, when the value in cell X2 is changed, the value in cell Y automatically changes. This is because the value in cell Y is calculated based on the formula: cell Y’s value = cell X1’s value + cell X2’s value. *Kanai* Figures 2 and 3; 3:60-4:24. Similarly, as shown in Figure 4, when the value in cell Y changes, the value in cell X1 automatically changes. This is because the value in cell X1 depends on the value of cell Y. *Kanai* Figure 4.

The Examiner argues that these same Figures and text passages from *Kanai* teach overriding, without deleting, the original content of a cell. However, nowhere do these passages make such a teaching. Instead, they merely teach bidirectional recalculation. *Kanai*’s cells X1, X2, and Y are different cells. Their values are influenced by the values of other cells (*e.g.*, $Y=X1+X2$). Therefore, their values are automatically recalculated when the value in an

influencing cell changes. Nowhere does *Kanai* suggest that its cell values are overridden without being deleted. Instead, *Kanai* merely teaches automatically recalculating cells.

Bhansali also fails to disclose or suggest overriding without deleting an original content of a cell, and then automatically restoring the original content to the cell after multiple recalculations, and independently of restoring an overridden, original content to a second cell.

Bhansali allows multiple users to edit a spreadsheet document by maintaining a local copy of the spreadsheet at each user's computer. A central copy is maintained on a centralized storage disk. Each user's computer includes a "memory change log" that keeps track of changes made by that user. When a user saves the user's changes, that user's memory change log is appended to a "disk change log" at the central storage disk. The changes of the various users are made to the centralized copy of the spreadsheet by sequentially processing each of the memory change logs that have been appended to the disk change log. When two users' edits conflict, either a user chooses the winning edit or the most recent edit is used. When a user's edit loses, an inverse of the edit is performed such that the end result is effectively that the edit never took place (*e.g.*, a losing edit that inserted a row is inversed by subsequently deleting the row).

In *Bhansali*, a record of losing edits is maintained at a user's computer in a "disk undo log" (losing edits are undone in the user's local copy). When the user saves the spreadsheet, the user's disk undo log is also appended to the centralized disk change log. Thus, when the centralized copy of the spreadsheet is updated, "memory change log" edits are implemented as well as "disk undo log" edits to correct any conflicts by implementing inverse actions of the losing edits. *Bhansali* 11:45-67.

Thus, unlike Applicant's claimed invention, *Bhansali* fails to disclose or suggest overriding without deleting the original content of a cell with a user inputted value, wherein the cell keeps the original content in the cell. Instead, *Bhansali* allows a user to overwrite and delete the original value of a cell in the user's local copy. The original content of the cell can be replaced by performing an inverse action. To perform the inverse action, *Bhansali* looks to its "disk undo log" to identify the losing action and then implements the losing action's inverse. Thus, the original content of a cell is not maintained in the cell, but in the disk undo log. *Bhansali* deletes the original content of a cell and then restores the original content with information that it retrieves from its disk undo log. Accordingly, *Bhansali* also fails to disclose or suggest overriding without deleting the original content of a cell with a user inputted value, wherein the cell keeps the original content in the cell. This is clearly unlike Applicants' claimed invention.

Therefore, Applicants submit that the Examiner has made clear error in rejecting claims 1, 8, and 11 based on *Kanai* in view of *Bhansali*.

Claims 2-6, 9-10 and 12-16 depend directly or indirectly from claim 1, 8, or 11 and are therefore allowable for at least the same reasons that claims 1, 8, and 11 are allowable.

B.) Claims claims 7, 17, and 18 are not rendered obvious under 35 U.S.C. §103(a) based on *Sorge et al.* (U.S. Patent No. 6,691,281) (“*Sorge*”) in view of *Zellweger et al.* (U.S. Patent No. 6,185,582) (“*Zellweger*”) and further in view of *Bhansali, et al.*:

Applicants submit the Examiner has made clear error rejecting claims 7, 17, and 18 based on the cited references.

Regarding claims 7 and 17:

Independent claims 7 and 17 each claim a plurality of cells each comprising a formula and a last result. A plurality of values are received for the plurality of cells. The values are stored in the last result of the plurality of the cells such that the values are used during recalculation instead of the formulas and such that each of the formulas for the plurality of the cells can be restored independently of other of the plurality of cells.

Applicants respectfully submit that the Examiner has made clear error by rejecting Applicants’ claimed invention based on *Sorge* in view of *Zellweger* and *Bhansali*. Specifically, the cited references fail to disclose or suggest a cell comprising a formula and a last result, wherein the value stored in the last result is used to recalculate the cell instead of the formula. In fact, nowhere do the cited references, taken singly or in combination, teach using a value stored in a last result to recalculate a cell instead of the cell’s formula. The Examiner cites several passages from *Sorge*, alleging that *Sorge* teaches using a value stored in the last result portion of a cell instead of the cell’s formula. However, none of the cited passages even relate to this. (*Office Action of 4/20/2006*, pages 8-9). Instead, the cited passages merely describe that the cells of a spreadsheet-version of a spreadsheet document can be replaced (*i.e.*, deleted and overwritten) with the cells of an HTML-version of the document (*Sorge* 4:10-20) and describe that the spreadsheet-version of the document can be conveniently converted to the HTML version (*Sorge* 10:45-57). Nowhere do these or other passages from *Sorge* discuss using a last result portion of a cell to recalculate instead of the cell’s formula.

As discussed above, *Sorge* maintains two versions of a spreadsheet document (a spreadsheet version and an HTML version) and replaces the cells in one version with the cells of the other version. *Sorge*, 4:10-20. When a value and formula are inserted into a spreadsheet cell from the HTML document, the value and formula overwrite the original content of the

spreadsheet cell. When the cell is recalculated, *Sorge* uses the cell's formula.

Unlike claims 7 and 17, nowhere does *Sorge* discuss using a received, stored value of a cell to recalculate the cell instead of a formula of the cell. Instead, *Sorge* merely teaches replacing the original content of a cell with a value and a formula from another document. Further, *Sorge* merely teaches that a cell's formula is used when recalculating.

Zellweger fails to disclose or suggest using a cell's stored value to recalculate the cell instead of the cell's formula. *Bhansali* also fails to discuss recalculating a cell using a received, stored value instead of the cell's formula.

Therefore, the Examiner has made clear error rejecting claims 7 and 17 based on *Sorge* in view of *Zellweger* and further in view of *Bhansali*.

Regarding claim 18:

Independent claim 18 claims a cell having a first storage area that stores a formula and a second storage area that stores a numerical value that temporarily overrides a formula so that the numerical value is used instead of the formula during recalculation.

As discussed above, *Sorge*, *Zellweger*, and *Bhansali*, taken singly or in combination, fail to disclose or suggest temporarily overriding the content of a cell and fails to disclose or suggest recalculating a cell using a value instead of the cell's formula. Instead, *Sorge* merely teaches overwriting a spreadsheet cell's contents, including its formula, with a value and formula from an HTML document. When *Sorge*'s spreadsheet cell's original contents are overwritten, they are not temporarily overridden -- in fact, they no longer exist.

Therefore, the Examiner has made clear error rejecting claim 18 based on *Sorge* in view of *Zellweger* and further in view of *Bhansali*.

CONCLUSION

In view of the foregoing, it is submitted that claims 1-45 are patentable. Therefore, the application is in condition for allowance. Notice to that effect is respectfully requested.

Respectfully submitted,

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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Docket Number (Optional)

30014200-1007

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Application Number

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08/01/2001

First Named Inventor

Matthias Breuer

Art Unit

2178

Examiner

Kyle R. Stork

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).

Note: No more than five (5) pages may be provided.

I am the

☐ applicant/inventor.

☐ assignee of record of the entire interest.
See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed.
(Form PTO/SB/96)

☒ attorney or agent of record.
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Signature

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312-876-8000

Telephone number

August 21, 2006

Date

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